

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

OMNIVISION TECHNOLOGIES, INC.,

Plaintiff,

v.

RE SECURED NETWORKS, LLC,

Defendant.

C.A. No. 24-187-JLH-CJB

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION CHART

Pursuant to Paragraph 12 of the Scheduling Order (D.I. 35) and the Amended Scheduling Order (D.I. 76; March 12, 2025 Oral Order), Plaintiff OmniVision Technologies, Inc. (“OmniVision”) and Defendant RE Secured Networks, LLC (“RE Secured”) hereby submit this Joint Claim Construction Chart for the disputed terms/phrases in U.S. Patent Nos. 7,323,671 (the “’671 Patent”), 7,800,145 (the “’145 Patent”), 7,495,274 (the “’274 Patent”), and 6,838,651 (the “’651 Patent”) (collectively “Patents-in-Suit”).

The parties have seven (7) claim construction disputes across the four (4) Patents-in-Suit and ten (10) asserted claims. The terms/phrases and constructions are set forth below, along with an identification of supporting intrinsic evidence. The parties expressly reserve the right to rely upon evidence cited by one another. The parties reserve the right to rely on extrinsic evidence (including expert declarations) as the claim construction process proceeds. The parties reserve the right to rely on intrinsic evidence identified as supporting its proposed construction of one term as intrinsic evidence supporting its proposed construction of any other term. The parties further reserve the right to rely on the language of any claim of the asserted patents, whether or not

asserted, as intrinsic evidence supporting their constructions. The parties further agree that the identification of text from the specification by column and line number should be understood to include a reference to any Figure mentioned in that passage of the specification, and similarly, that the identification of any Figure should be understood to include a reference to any written text in the specification describing that Figure.

RE Secured has stated to OmniVision that it has withdrawn claim 13 of the '651 patent from the case. OmniVision reserves the right to move the Court to hold this claim to be invalid due to indefiniteness if RE Secured reasserts this claim.

Attached as Exhibit A is a joint chart identifying: (1) the disputed terms/phrases; (2) each party's proposed construction of the disputed claim language; and (3) citation(s) to the intrinsic evidence in support of the parties' respective proposed constructions. *See* D.I. 35 at ¶ 12. Attached as Exhibit B is Joint Claim Construction Appendix including text searchable PDF copies of the Patents-in-Suit and relevant portions of prosecution histories.

Dated: March 21, 2025

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